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046316

Meeting Minutes Transmittal/Approval
Unit Manager's Meeting: Remedial Action and Waste Disposal Unit/Source Operable Unit
3350 George Washington Way, Room 1B45, Richland, Washington
November 21, 1996

FROM/APPROVAL: Nancy Werdel Date 2-20-97 1/16/97
Nancy Werdel/Glenn Goldberg, 100 Area Unit Managers, RL (H0-12)

APPROVAL: Keith K. Holliday Date 1-16-97
Wayne Soper/Keith Holliday, 100 Aggregate Area Unit Manager, Ecology (B5-18)

APPROVAL: Kevin Oates Date 1/16/97
Dennis Faulk/Kevin Oates, 100 Aggregate Area Unit Managers, EPA (B5-01)

APPROVAL: Bryan Foley Date 1/21/97
Bryan Foley, 200 Area Unit Manager, RL (H0-12)

APPROVAL: N/A Date 5/29/97
Gary Freedman/Norman Hepner, 200 Aggregate Area Unit Managers Ecology (B5-18) JOAN BARTZ / SHAI MOHAN

APPROVAL: N/A Date _____
David Einan/Paul Beaver, 200 Area Aggregate Area Unit Managers, EPA (B5-01)

APPROVAL: Robert G. McLeod Date Jan 16, 1997
Robert G. McLeod, 300 Area Unit Manager, RL (H0-12)

APPROVAL: Jeanne Wallace Date 2/17/97
Jeanne Wallace, 300 Area Aggregated Area Unit Manager
WA Dept of Ecology (B5-18)


APPROVAL: David R. Einan Date 16 Jan 97
David R. Einan, 300 Area Aggregated Unit Manager, EPA (B5-01)

APPROVAL: Ted A. Wooley Date 20 Feb 97
Ted A. Wooley, 300 Area Process Trenches Subproject Manager

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Attachment #1	-	Agenda
Attachment #2	-	Attendance Record
Attachment #3	-	Meeting Minutes
Attachment #4	-	Status Package
Attachment #5	-	NRDWL Package
Attachment #6	-	Snow Canyon Package
Attachment #7	-	Change Control Package

Prepared by:


Gary Gesell/Tamen Lundquist (H0-17)

Date 5/19/97

Concurrence by:


Vern Dronen, BHI Remedial Action and Waste Disposal Project Manager
(H0-17)

Date 5/19/97

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UNIT MANAGER'S MEETING AGENDA
3350 George Washington Way, Room 1B45
November 21, 1996

1:00 p.m. 200 Area

- 200-UP-2 Current Work and Future UMM Schedule
- 200-BP-11 Snow's Canyon DQO to Support TWRS Privatization
- NRDWL Scope of Work Changes Due to Integration With SWL

2:00 p.m. 300 Area

300 FF-1

- Remedial Action Procurement
- RDR/RAWP
- Independent PE Closure Subcontract for Process Trenches

300-FF-2

- LFI Report Status
- Initial Results from Groundwater Sampling at Well 699-S6-E4A

3:00 p.m. 100 Area

- 100 Area ROD Strategy
- Draft ROD Amendment Status
- Status of Liquid IDW Disposal

100-IU-2/5/6

- Status of TPA Milestones for 100-IU-2 and 100-IU-6 OU's
- Groundwater Issue About Regulatory Agenda Lead for 100-IU-5 OU

100-D Ponds

- Discuss Funding for the 100-D Ponds Boreholes
- 100-D Ponds Equivalency Status

100-B/C

- Remedial Action Status
- Verification Package - 116-B-5 Crib
- SAP and RDR/RAWP Revisions

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Remedial Action and Waste Disposal Unit Manager's Meeting
 Official Attendance Record
 November 21, 1996

print clearly and use black ink

PRINTED NAME	ORGANIZATION	O.U. ROLE	TELEPHONE
BRYAN FOLEY	DOE-RL	1121	376-7087
JOAN BARTZ	ECOLOGY	Sub-Project Manager	736-5707
GREG MITCHEM	BHI	200 TASK LEAD	372-9632
SHRI MOHAN	Ecology	D-Plant Proj. Mgr NRDWL - sub PM	736-4704
GARY GESELL	BHI	RAWID Lead Editor	372-9067
Larry Hulstrom	ITH	300 Area Tech. Support	372-9685
CHARLIE JOHNSON	BHI	300 TASK LEAD	372-9603
Bob McLeod	DOE	300 Area PM	372-9676
Keith Wells	Ecology	300 AREA	736-3012
Richard A. Carlson	BHI	300 Technical Lead	372-9623
Dave Einar	EPA	300 Area PM	876-3883
Fred Roach	BHI	100, 200, 300 Areas	372-9086
Clarence Corriveau	BHI	WD Area	372-9565
Glenn Goldberg	DOE-RL	100 Area	376-9552
John Ludowise	CHI	IDW Lead	372-9664
Scott Petersen	CHI	100-D Ponds lead	372-9574
Chuck Hadel	CHI	100 Area Lead	372-9637
Roger Orink	CHI	Remaining Sites (100-Area)	372-9631
Keith Holliday	Ecology	Project. Mgr	736-3030

[illegible]

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**Unit Managers' Meeting Minutes
November 21, 1996**

100 AREAS

100 Area ROD Strategy

A meeting with the U.S. Environmental Protection Agency (EPA), the U.S. Department of Energy, Richland Operations Office (RL), and the Washington State Department of Ecology (Ecology) is planned for December 6, 1996, to discuss (among other issues) plans for mutual development of a strategy for 100 Area Records of Decision (ROD).

Draft ROD Amendment Status

A draft summarizing an agreement on how remediation of the *Resource Conservation and Recovery Act of 1976* (RCRA) Past Practice Units (RPP) will be handled under the *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA) will be evaluated by Ecology. Ecology will evaluate the issue internally and prepare a flowchart delineating this process for RPPs. Ecology and EPA indicated that a Tri-Party understanding on the issue and process will be presented in the ROD amendment. A project meeting to finalize the ROD amendment is scheduled for November 26, 1996.

proposed Plan

Status of Liquid IDW Disposal

The most cost-efficient and effective means to dispose of approximately 3,000 gallons of IDW is to dispose of it at ETF. The Environmental Restoration Contractor (ERC) will meet with EPA and Ecology during December 1996 to discuss this approach and confirm the understanding by using a Tri-Party Agreement form.

100-IU-2/5/6

Status of Tri-Party Agreement Milestones for 100-IU-2 and 100-IU-6 OUs

In a letter dated November 20, 1996, EPA confirmed that Tri-Party Agreement Milestone M-13-00J for submittal of planning documents necessary to complete the remedial investigation/feasibility study process for the 100-IU-2 and 100-IU-6 Operable Units has been met.

Groundwater Issue About Regulatory Agenda Lead for 100-IU-5 OU

The lead regulatory agency for the 100-IU-5 Operable Unit is being changed from Ecology to EPA to accommodate recent changes in the groundwater monitoring program for the 100-FR-3 Operable Unit to incorporate the 100-IU-5 Operable Unit. The change will make EPA the lead regulatory agency for both operable units.

100-D PondsDiscuss Funding for the 100-D Ponds Boreholes

Ecology requested RL and ERC assistance to identify the process used during meetings held in September 1996 to delete workscope and budget for vadose zone boreholes from the fiscal year 1997 work plan.

Action: RL and ERC to search for RMT meeting minutes.

100-D Ponds Equivalency Status

Following up from a November 12, 1996, project meeting on an equivalency demonstration, Ecology reported that the agency is authorized to administer equivalency at RCRA TSDs. The authority is described in correspondence between Ecology and RL. In addition, Ecology indicated that, following internal discussions with RCRA staff, the state has an equivalency demonstration standard that is as or more stringent than the federal regulation. As a result, EPA approval of equivalency demonstrations is not required. Therefore, it is Ecology's position that EPA approval of a 100-D Ponds equivalency is not required and only Ecology's approval is needed. EPA concurred, indicating that (based on a Memorandum of Understanding between EPA and Ecology on implementation of RCRA at the Hanford Site) EPA's approval on an equivalency demonstration at 100-D Ponds is not necessary.

100-B/CGroundwater Sampling

Because of budget constraints, this years groundwater sampling at 100-B/C will be canceled. The EPA expressed concern about the reduction in groundwater sampling during remediation.

116-C-1 Trench

The base excavation was completed on November 15; approximately 46,000 LCY were removed. Cleanup verification is in progress (with field screening). Bechtel Hanford, Inc. (BHI)

is preparing to chase down an additional plume to the north of the trench (size of plume is unknown - it is in the upper 15 ft). The subcontract contains unit rates for additional excavation volume.

Verification of the south half of the trench is being pursued so that overburden could be replaced in the trench. Lay-down areas for overburden are in short supply.

116-C-5 Retention Basin

Soils excavation and container loading is in progress. Lead bricks and sheets (LDR material) were encountered in the soil. BHI is evaluating two disposal options: decontamination and recycle the lead or encapsulate and dispose of the lead. If treatment options are chosen, EPA approval will be requested. A lead management program was suggested by EPA.

Process Effluent Pipelines

Some overburden has been removed between C-1 and C-5. There are no near-term plans to remove additional pipe.

116-B-4 Soil Pile and Soil Bags

A total of 4,124 tons were removed from the soil pile, approximately 800 tons remain in the soil pile, and 381 soil bags remain. Used as fill-in work if equipment is not working on a given day.

116-B-5 Crib

The verification package has again been revised. BHI is processing a change order to remove soil with tritium (cell C and D soil) and complete the backfill.

RDR/RAWP and SAP Revisions

Nancy Werdel will transmit revisions to the Remedial Design Report/Remedial Action Work Plan for the 100 Area (DOE/RL-96-17) and the 100-BC-1, 100-DR-1, and 100-HR-1 Sampling and Analysis Plan (DOE/RL-96-22) to EPA and Ecology. Document revisions will be published upon receipt of EPA and Ecology concurrence.

200 AREA

200-BP-11

- Action: Jack Donnelly requested Snow's Canyon to be stricken from the agenda.
- A-29 Ditch: Zelma Maine-Jackson (new unit manager) is now responsible for this work load.

200-UP-2

Tri-Party Agreement Change Package for M-15-15E: Input was provided from Ecology before the meeting. No changes to Ecology's input were anticipated by Bryan Foley. RL and Ecology do not expect comments from EPA. All attendees agreed to the change package text, which removes the requirement to submit a final focused feasibility study and proposed plan. Only the Limited Field Investigation (LFI) document remains to be submitted by December 1996. (The LFI was finalized and submitted in Nov.(?) 1997.) The change package also addresses the closure requirements for the 216-U-12 Permit. *Nov. 28, 1995*

Joan Bartz stated that monthly UMMs are not needed for UP-2; rather, meetings will be scheduled every 6 months for the TSD unit (i.e., 216-U-12 Crib). At least one meeting per year will include a visit to the TSD unit. Therefore, Ecology and RL will schedule meetings on an as-needed basis for the 200-UP-2 Operable Unit. Bryan Foley suggested transferring the OU to the waste site unit groupings. This will be addressed as part of the strategy activities.

Future UMMs

The 216-U-12 Crib UMM will be in May 1997 and will include a field visit to 216-U-12. The 200-UP-2 UMM will be postponed until further notice.

NRDWL Scope of Work Changes Due to Integration with SWL

Scope of Work: The attached cc:Mail was reviewed, and RL and Ecology agree to the current status of NRDWL efforts (as discussed in the cc:Mail). The extent of the NRDWL soil gas activities need to be discussed once the amount of work needed for the solid waste landfill (SWL) is resolved/determined. This information should then be included in the NRDWL Impacts Evaluation Report discussed in the Multi-Year Work Plan. The details associated with the integration (of NRDWL and SWL) have yet to be defined, and is pending the SWL soil gas recommendations.

Barrier Testing/Monitoring at BP-1

The asphalt testing for FY 1997 is in jeopardy because of budget constraints.

300 AREA

Action Item: Prepare a memo (it defines when activities are completed) proposing clarifying definition of closure of the Process Trenches and submit to Ecology for concurrence. Status: A draft has been prepared and it will be issued soon.

300-FF-1 Operable UnitRemedial Action Procurement

On hold. A letter has been issued to the bidders to extend bids to December 16, 1996. Depending on the actual subcontract start date, prices may change (e.g., if people change projects, moving equipment can raise the cost).

Remedial Design Report (RDR)/Remedial Action Work Plan (RAWP)

Ecology indicated that the Department of Health (DOH) concurs with the RDR/RAWP and is ready to sign off on the document (Drew Thatcher). However, it was questioned as to why DOH actually needs to sign the document.

Ecology would like to see the RDR/RAWP issued, which includes the project schedule for the process trenches. RL indicated that the RDR/RAWP is ready to be issued except for the schedule, which cannot be finalized until the budget is resolved. Also, the DQO Summary Report Text Review must be completed by Ecology before the RDR/RAWP can be released. RL questioned whether or not Ecology is planning to use the RDR/RAWP schedule to apply penalties if not met. Ecology indicated that no penalty will be given if the schedule is adjusted, as long as a good faith remediation effort is underway.

Process Trenches Independent PE for Certification of Closure Subcontract

The Request for Proposal is being reviewed by 5 to 6 bidders. The bids have been extended and will be received in December 1996.

Construction Facilities Setup

Everything is installed except for the septic tank, which has been delayed until November 27, 1996. The phone/computer lines will not be activated until the facility is occupied (to save costs).

ATSDR Public Health Assessment Review

The 300 Area Public Health Assessment (which is approximately 75% complete) was reviewed by RL. ATSDR's assessment to date has basically resulted in the same conclusions as the RI/FS for 300-FF-1 and 300-FF-5. ATSDR has included an additional pathway in its evaluation, which is hunting and gathering via traditional tribal use.

Air Emissions Estimate/DOH Meeting

An air emissions estimate, including calculations and proposed monitoring, was presented to DOH on November 11, 1996. The calculation methodology and planned monitoring were acceptable to DOH. However, DOH wants more frequent use of crusting agents than currently planned. The project will evaluate the use of a graded approach to resolve the issue. A follow-up meeting is planned with DOH on December 9, 1996.

Process Trenches Waste Designation

1. The cadmium driver does not have a typical data distribution (nonparametric and is being looked at by a statistician).
2. The potential uranium issue related to ERDF leachate is being evaluated, but has no bearing on the process trenches waste designation as earlier thought. Therefore, the waste designation will be completed once the cadmium issue is resolved.

300-FF-2 Operable Unit

LFI Report Status

Regulatory comments are being reviewed and resolved with RL. BHI, RL, and EPA are planning to discuss the comments on November 27, 1996.

Initial Results from Groundwater Sampling at Well 699-S6-E4A

Uranium levels are down in the 30 to 40 $\mu\text{g/L}$ range. Data on chemical constituents has arrived, but has not been evaluated.

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STATUS PACKAGE

UNIT MANAGERS' MEETING - NOVEMBER 1996

SOURCE OPERABLE UNITS

100-B/C, 100-K, 100-D, 100-H, 100-F

200 AREAS

300 AREA

prepared by

DOE-RL

11/21/96

100 AREAS

Assessment Activities

proposed Plan
100 Area Remaining Sites ROD Amendment/Group-B Explanation of Significant Differences (ESD) - On October 30, 1996, RL received from EPA and Ecology a draft of the proposed ROD Amendment to add 34 radioactive liquid effluent disposal sites to the September 1995 ROD for the 100-BC-1, 100-HR-1, and 100-DR-1 Operable Units. RL is reviewing the draft and plans to meet with EPA and Ecology during early November. Except for differences regarding the redesignation of operable units from RCRA to CERCLA past practice units, the draft ROD Amendment is similar to RL's draft Group-A ESD that had been submitted to the regulatory agencies during August 1996 and was the basis for the regulator's draft ROD Amendment.

A second ROD amendment (formerly Group-B ESD) is underway by RL, but will not be completed until information on format and content is confirmed for the first ROD amendment (formerly Group-A ESD). The regulatory agencies have informed RL that the strategy for 100 Area RODs (see below) will not include a second ROD Amendment.

Remaining Sites Confirmatory Sampling Effort (CSE)/Focused Feasibility Study (FFS) - The CSE and FFS for the 100 Area Remaining Sites project remain on hold due to delays in receipt of regulator comments on the Sampling and Analysis Plan (SAP) and lack of agreement on an overall ROD strategy for remaining 100 Area source operable unit waste sites. Meetings are scheduled for November 1996 with EPA and Ecology upper management to discuss a proposal to complete assessment activities and reach decision documents for all remaining 100 Area waste sites. As soon as the Tri-Parties have agreed on a path forward.

100-IU-2 and 100-IU-6 - The 100-IU-2 and 100-IU-6 Focus Package (Rev. 0) was transmitted to EPA and Ecology by RL in mid-October 1996. The submittal supports RL's fulfillment of the requirements of *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Milestone M-13-00J. Public review of the Focus Package is not planned based on EPA's indication that pending revision to the Tri-Party Agreement Community Relations Plan are likely to eliminate the requirement for a 30-day public comment period on work plans.

100-D Ponds Closure Plan Revision

Laboratory analyses for verification sampling conducted during August 1996 were completed on October 18, 1996. Data validation is in progress and is planned to be completed during late November 1996. Preliminary results indicate that cleanup goals for 100-D Ponds have been achieved. Work on revising the 100-D Ponds Closure Plan was initiated in October. Ecology has inquired about the status of vadose zone boreholes, which were eliminated in final RL multi-year work plan during September 1996.

100, 200, and 300 Area Liquid Investigation Derived (IDW) Disposal

On October 31, 1996, RL approved a Baseline Change Proposal to initiate work on disposal of liquid IDW. This work is a follow-up to IDW disposal of solid IDW for the 100, 200, and 300 Areas, completed during September 1996. After plans are formulated, RL plans to meet with EPA and Ecology during November 1996 to discuss alternatives.

100-B/C-1

Remedial Action - Excavation of 116-C-1 soil is ongoing, and completion of the base excavation is expected in mid-November 1996. It appears that there is a waste plume extending to the north, which will also require excavation. Additional soils and scrap steel from the 116-C-5 Retention Basins and the effluent pipelines were excavated in October 1996. More than 60,000 tons of waste have been excavated and shipped to ERDF. Revisions to the Remedial Design Report (RDR)/Remedial Action Work Plan (RAWP) and to the SAP have been completed. The EPA and Ecology have reviewed the cleanup verification package for the 116-B-5 Crib and are awaiting transmittal of the revised document.

200 AREAS

200-UP-2 Operable Unit

200-UP-2 FFS - A Tri-Party Agreement change package deleting the FFS and proposed plan for the 200-UP-2 is being prepared, along with a letter to Ecology confirming the schedule for the 216-U-12 Crib/Postclosure Plan to meet the permit modification schedule of 2003.

200 Areas Strategy

The Waste Site Grouping Report (formerly the Technical Document) is being finalized. Working meetings are continuing on Tri-Party Agreement change package and public involvement efforts. A presentation to the Results Management Team is being developed to provide the latest Tri-Party Agreement change package proposal. A Public Involvement Plan is being developed based on joint RL, EPA, and Ecology direction.

200-BP-1 Operable Unit

The barrier testing program continues to provide data on water infiltration, vegetation growth, and bio-intrusion associated with the Hanford Site Barrier. Additional asphalt testing has been scoped for fiscal year 1997, and initial work has been done to initiate this work.

200-BP-11 Operable Unit

The DQO for the Tank Waste Remediation System (TWRS) privatization project emergency egress and pipe transfer lines routing across the 216-A-29 Ditch (a treatment, storage, and disposal unit) is being initiated. This work has been funded from the TWRS privatization project, and a schedule is being developed.

200-IU-3 Operable Unit

Non-Radioactive Dangerous Waste Landfill (NRDWL) - ERC input on the Solid Waste Landfill (SWL) soil gas SAP has been provided to ensure NRDWL integration is considered in the development of the SAP. NRDWL activities are awaiting finalization of SWL data needs decisions. Data collection will factor in NRDWL/SWL integration.

300 AREA**300-FF-1 Operable Unit**

Remedial Design/Action - The RA subcontract RFP technical evaluation was completed. A memo was sent to all bidders requesting an extension of each firm's proposal through December 17, 1996, allowing additional potential funding constraints on the project.

All sets of DQO meeting minutes were signed by the Tri-Parties. DQO summary report text was reviewed, revised, and resent to the decision makers for final comment before issuing the report. The RDR/RAWP is completed and ready to issue pending any changes to the remediation schedule.

Activities to set up the ERC remedial action support facilities at the 300-FF-1 Operable Unit are completed except for installation and acceptance inspection of the septic holding tank. However, temporary facilities are in place until the tank is installed. The facilities were ready for occupancy on October 30, 1996.

An RFP was issued to five bidders soliciting an Independent Registered Professional Engineer to certify closure of the 300 Area Process Trenches. Questions on the RFP are due from the bidders by November 8, 1996, and the bids are due on November 18, 1996.

300-FF-2 Operable Unit

Limited Field Investigation (LFI) Report - The LFI report is currently under regulatory review with comments due by November 7, 1996.

046316

Author: Shri Mohan at ~HANFORD02A
Date: 11/20/96 8:40 AM
Priority: Urgent
Receipt Requested
TO: Gregory B Mitchem at ~BHI008
TO: Fenggang Ma
TO: Moses N Jarayssi
TO: Laura J Cusack
TO: Bryan L Foley at ~DOE6
TO: Shri Mohan
Subject: Re: NRDWL Scope of Work

----- Message Contents -----

Greg:

The following is response to your message. The text below may be incorporated in the meeting minutes:

" Ecology agrees to coordinate the soil gas work planned for NRDWL during the first quarter of FY97 with soil gas work of the SWL. Ecology expects that the SWL Sampling and Analysis Plan to be ready by the middle of December 96 and the actual field survey will be done during the Spring of 1997. Ecology would like NRDWL survey to be done during the current FY and effectively use the FY97 allocated budget. This survey will play an important role in future planning and executing of the landfill"

In view of the above I may not be attending the UMM.

Shri

Reply Separator

Subject: NRDWL Scope of Work
Author: Gregory B Mitchem at ~bhi008
Date: 11/18/96 12:35 PM

Shri, This is a follow up to our conversation just over a month ago where we discussed the short term plans for NRDWL. As you recall, we put the soil gas work planned for the first quarter of FY97 on hold pending the outcome of the SWL Sampling and Analysis Plan development effort and determination of the SWL funding picture. We discussed that it would be best to do our future field work at the same time that SWL does their's. I had asked you to reply to my cc:mail documenting the conversation so I could get your concurrence with this approach. I still need that confirmation. Bryan and I are hanging out there right now and I need your concurrence in order to submit the proper budget and schedule changes to "reserve" this money for its intended use (NRDWL). With the budget picture the way it is (people looking to take money away from projects where ever they can) the sooner I can get your okay, the sooner I can submit the paperwork. I have put this matter on the agenda for the Unit Manager's Meeting so we can deal with it at that time. However, if I get some type of confirmation from you before then we may not need to have the UMM. If I don't hear from you before Thursday, I will see you at the UMM. Greg

046316

Subject: Snow's Canyon (A-29 Trench) DQO

The crossing of Snow's Canyon with a utility corridor is one critical element in a baseline plan to provide site services to two proposed radioactive waste treatment facilities to be constructed and operated by private contractors. These proposed facilities and their operations represent Phase 1 of DOE's TWRS Privatization Initiative.

Currently, a Characterization Plan for the designated area these facilities and infrastructure will occupy is in preparation and will be completed in February, 1997. Implementation of the plan with follow-on data acquisition is scheduled soon thereafter. Currently, this Characterization Plan and follow-on data acquisition strategy DOES NOT include the proposed Snow's Canyon crossing area, because the need for the corridor was not identified in the original site selection task. It wasn't until more detailed utilities and site services studies were completed in September that the Snow's Canyon utilities crossing was selected as the preferred alternative for routing utilities to the waste treatment facilities.

It is most desirable to complete the subject DQO as soon as possible for two primary reasons.

1. Conceptual design for facilities site development and utilities infrastructure is scheduled to begin in January 1997; a date dictated by the need to complete site development infrastructure by December 1999 (a DOE contractual obligation). To support this effort, it is critical to understand the basis under which the Snow's Canyon crossing can be considered in the utilities/services routing. It is important to understand any uncertainties before design begins so they can be considered in future project planning, cost estimates, schedule, etc.

2. If further site characterization data requirements result from the DQO, it is critical that these be identified as soon as possible and integrated into the site Characterization Plan and follow-on data acquisition strategy. The Plan is expected to be issued for comment in January, approved and released in February.

As the Privatization Initiative proceeds through Phase 1, this DQO task albeit small, represents a critical element in the success of these early steps towards Privatization. Current planning calls for completion of the DQO and Summary Report by December 13, 1996. Your timely support and that of others on your DQO team is needed if we are to meet this date. If adjustments in priorities, etc. are necessary, I ask that they be strongly considered and I thank you in advance for any imposition.

046316

Change Number	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 11/20/96
Originator		Phone
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title This change will eliminate the requirement for submittal of final versions of the 200-UP-2 Focused Feasibility Study and Proposed Plan and <u>will remove any reference to the satisfying the RCRA closure of the 216-U-12 Crib requirements.</u> (A portion of M-15-15E <u>was previously has been satisfied through submittal of the Limited Field Investigation Report, Rev. 0, November 28, 1995)</u>		
Description/Justification of Change The 200 Areas sStrategy has been developed thato provides a basis for 200 Areas <u>characterization and remediation activities. It and incorporates the 200-UP-2 waste sites in future planned activities in the 200 Areas. The draft Focused Feasibility Study and Proposed Plan for 200-UP-2 indicates that <u>only there is no need for additional actions at this time beyond current surveillance and maintenance activities are needed at this time. The 216-U-12 Crib continues to be subject to all interim status RCRA requirements, e.g., inspections.</u></u> <u>Thus, Therefore, finalization of the FFS and Proposed Plan requirements under will be deleted from M-15-15E, will be deleted and the December 31, 1996 milestone date will be applicable to the Limited Field Investigation Report. The Submission of closure plan requirements for the 216-U-12 Crib will be scheduled through the Hanford Facility Permit. The following modification is is proposed:</u> Modify text from Milestone M-15-15E as follows: ISSUE FINAL DRAFT 200-UP-2 LIMITED FIELD INVESTIGATION (LFI) REPORT, FINAL DRAFT FFS REPORT, AND FINAL DRAFT IRM PROPOSED PLAN (THIS SEQUENCE OF DOCUMENTS WILL INCLUDE THE REQUIREMENTS OF THE 216 U 12 RCRA CLOSURE/POSTCLOSURE PLAN) TO ECOLOGY AND EPA. THE LFI REPORT, FFS REPORT, AND IRM PROPOSED PLAN WILL EACH UNDERGO REGULATOR REVIEW AND COMMENT INCORPORATION TO PRODUCE AN APPROVED DOCUMENT. EACH DOCUMENT THAT ADDRESSES RCRA CLOSURE WILL BE STRUCTURED SUCH THAT THE RCRA CLOSURE ASPECTS CAN BE READILY IDENTIFIED FOR A SEPARATE REVIEW/APPROVAL PROCESS.		
Impact of Change This change <u>will would delay postpone the integration of the eClosure/pPost-closure pPlan for the 216-U-12 Crib until into the year 2003. Permit Mmodification and will allow the integration of the 200-UP-2 Operable Unit CERCLA requirements into the 200 Area Strategy.</u>		

Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan

Focused Feasibility Study for the 200-UP-2 Operable Unit (Draft)Proposed Plan for the 200-UP-2 Operable Unit (Draft)

216-U-12 Crib Closure/Post-Closure Plan

Hanford Facility (RCRA) Sitewide Permit Modification Table

Approvals

_____	_____	___	Approved	___	Disapproved
DOE	Date				
_____	_____	___	Approved	___	Disapproved
EPA	Date				
_____	_____	___	Approved	___	Disapproved
Ecology	Date				

Distribution
Unit Manager's Meeting: Remedial Action Unit/Source Operable Units
100, 200, and 300 Areas

046316

Nancy Werdel	DOE-RL, RP (H0-12)
Mike Thompson	DOE-RL, RP (H0-12)
Glenn Goldberg	DOE-RL, RP (H0-12)
John Murphy	DOE-RL, RP (H0-12)
Rich Holten	DOE-RL, RP (H0-12)
Bryan Foley	DOE-RL, RP (H0-12)
Robert McLeod	DOE-RL-RP (H0-12)
Ellen Mattlin	DOE-RL, EAP (A5-15)
Steve Balone	DOE-RL, RPS (H0-12)
Lisa Treichel	DOE-HQ (EM-442)
Rich Person	DOE-HQ (EM-442)
Dennis Faulk	100 Aggregate Area Manager, EPA (B5-01)
David Einan	EPA
Paul Beaver	EPA
Larry Gadbois	EPA
Kevin Oates	EPA
Phil Staats	100 Aggregate Area Manager, WDOE (B5-18)
Chuck Cline	WDOE (Lacey)
Wayne Soper	WDOE (Kennewick) (B5-18)
Ted Wooley	WDOE (Kennewick) (B5-18)
Gary Freedman	WDOE (Kennewick) (B5-18)
Norman Hepner	WDOE (Kennewick) (B5-18)
David Holland	WDOE (Kennewick) (B5-18)
Keith Holliday	WDOE (Kennewick) (B5-18)
Lynn Albin	Washington Dept. of Health
V. R. Dronen	(H0-17)
G. O. Gesell	(H0-17)
T. L. Lundquist	(H0-17)
J. R. James	(H0-17)
G. E. Van Sickle	(X3-40)
J. G. Woolard	(H0-17)
C. R. Johnson	(H0-17)
R. A. Carlson	(H0-17)
L. C. Hulstrom	(H9-11)
M. J. Galgoul	(H9-12)
Alvina Goforth	BHI DCC (H0-09) Kay KimmelMAC (B1-42)
T. M. Wintczak	BHI (H0-11)
Andrea Hopkins	BHI (H9-11)
Tom Page (Please route to:)	PNNL (K9-18)
Cheryl Thornhill	PNNL (K9-14)
Steve Slate	PNNL (K9-14)

Please inform Tamen Lundquist (372-9562) of BHI
of deletions or additions to the distribution list. Attachment #1